1	EDMUND G. BROWN JR., Attorney General	
2	of the State of California JOSE R. GUERRERO, State Bar No. 97276	
3	Supervising Deputy Attorney General CATHERINE E. SANTILLAN	
4	Senior Legal Analyst 455 Golden Gate Avenue, Suite 11000	
5	San Francisco, CA 94102-7004 Telephone: (415) 703-5579	
6	Facsimile: (415) 703-5480	
7	Attorneys for Complainant	
8	BEFORE THE RESPIRATORY CARE BOARD	
9	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA	
10	In the Matter of the Accusation Against:	Case No. R-2090
11	ANGIE MARIE JOHNSON	STIPULATED SURRENDER OF
12	17521 Eel River Road Potter Valley, CA 95469	LICENSE AND ORDER
13		
14	Respiratory Care Practitioner License No. 23652	
15	Respondent.	
16		
17	IT IS HEREBY STIPULATED AND AGREED by and between the parties in this	
18	proceeding that the following matters are true:	
19	<u>PARTIES</u>	
20	1. Stephanie Nunez (Complainant) is the Executive Officer of the	
21	Respiratory Care Board of California. She brought this action solely in her official capacity and	
22	is represented in this matter by Edmund G. Brown Ja	r., Attorney General of the State of
23	California, by Catherine E. Santillan, Senior Legal Analyst.	
24	2. Angie Marie Johnson (Respondent) is representing herself in this	
25	proceeding and has chosen not to exercise her right to be represented by counsel.	
26	3. On or about June 23, 2004, the Respiratory Care Board of California	
27	issued Respiratory Care Practitioner License No. 23652 to Angie Marie Johnson (Respondent).	
28	The license expired on July 13, 2006, and has not be	een renewed.

JURISDICTION

4. Accusation No. R-2090 was filed before the Respiratory Care Board (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on July 10, 2007. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. R-2090 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

- Respondent has carefully read, and understands the charges and allegations
 in Accusation No. R-2090. Respondent also has carefully read, and understands the effects of
 this Stipulated Surrender of License and Order.
- 6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

- 8. Respondent admits the truth of each and every charge and allegation in Accusation No. R-2090, agrees that cause exists for discipline and hereby surrenders her Respiratory Care Practitioner License No. 23652 for the Board's formal acceptance.
- 9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Respiratory Care Practitioner License without further process.

27 ///

28 ///

CONTINGENCY

10. This stipulation shall be subject to approval by the Respiratory Care
Board. Respondent understands and agrees that counsel for Complainant and the staff of the
Respiratory Care Board of California may communicate directly with the Board regarding this
stipulation and surrender, without notice to or participation by Respondent. By signing the
stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary
Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
action between the parties, and the Board shall not be disqualified from further action by having
considered this matter.

- 11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.
- 12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Respiratory Care Practitioner License No. 23652, issued to Respondent Angie Marie Johnson, is surrendered and accepted by the Respiratory Care Board.

- 13. The surrender of Respondent's Respiratory Care Practitioner License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.
- 14. Respondent shall lose all rights and privileges as a respiratory care practitioner in California as of the effective date of the Board's Decision and Order.

28 ///

1	15. Respondent shall cause to be delivered to the Board her pocket license	
2	certificate on or before the effective date of the Decision and Order.	
3	16. Respondent fully understands and agrees that if she ever files an	
4	application for licensure or a petition for reinstatement in the State of California, the Board shall	
5	treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations	
6	and procedures for reinstatement of a revoked license in effect at the time the petition is filed,	
7	and all of the charges and allegations contained in Accusation No. R-2090 shall be deemed to be	
8	true, correct and admitted by Respondent when the Board determines whether to grant or deny	
9	the petition.	
10	17. Respondent shall pay the Board its costs of investigation and enforcement	
11	in the amount of \$1,616.00 before her application for a new or reinstated license is considered by	
12	the Board.	
13	<u>ACCEPTANCE</u>	
14	I have carefully read the Stipulated Surrender of License and Order. I understand	
15	the stipulation and the effect it will have on my Respiratory Care Practitioner License. I enter	
16	into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and	
17	agree to be bound by the Decision and Order of the Respiratory Care Board.	
18	DATED: December 10, 2007.	
19		
20	<u>Original signed by:</u> Angie Marie Johnson	
21	Respondent	
22		
23		
24		
25		
26		
27		
28		

1	<u>ENDORSEMENT</u>	
2	The foregoing Stipulated Surrender of License and Order is hereby respectfully	
3	submitted for consideration by the Respiratory Care Board of the Department of Consumer	
4	Affairs.	
5	DATED: December 13, 2007	
6	EDMUND G. BROWN JR., Attorney General of the State of California	
7 8	JOSE R. GUERRERO Supervising Deputy Attorney General	
9		
10		
11	Original signed by: CATHERINE É. SANTILLAN	
12	Senior Legal Analyst	
13	Attorneys for Complainant	
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

BEFORE THE RESPIRATORY CARE BOARD DEPARTMENT OF CONSUMER AFFAIRS **STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. R-2090

ANGIE MARIE JOHNSON 17521 Eel River Road Potter Valley, CA 95469

Respiratory Care Practitioner License No. 23652

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Respiratory Care Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 21, 2008.

It is so ORDERED January 11, 2008.

Original signed by: LARRY L. RENNER, BS, RRT, RCP, RPFT PRESIDENT, RESPIRATORY CARÉ BOARD DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA